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**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

In re loanDepot Data Breach Litigation

This Document Relates to: All Cases

Case No.: 8:24-cv-00136-DOC-JDEx

Assigned for All Purposes to:
Courtroom 10A; Hon. David O. Carter

**DECLARATION OF JERRY
THOMPSON IN SUPPORT OF
PLAINTIFFS' MOTION FOR
PRELIMINARY APPROVAL OF
CLASS ACTION SETTLEMENT**

**[Filed Concurrently with Motion,
Declarations and [Proposed] Order]**

**DECLARATION OF JERRY THOMPSON IN SUPPORT OF PLAINTIFFS'
MOTION FOR PRELIMINARY APPROVAL**

1 I, Jerry Thompson, declare as follows:

2 1. I am the Executive Vice President of CyEx LLC, which is providing the
3 Financial Monitoring and Identity Theft Insurance Services to the Participating
4 Settlement Class Members electing to receive that benefit in this Settlement. I have
5 worked at CyEx since February 2019 and am intimately familiar with the company and
6 its Financial Shield Pro product. I have personal knowledge of the matters stated herein
7 and, if called upon, I could and would competently testify thereto. I submit this
8 Declaration in support of Plaintiffs' Motion for Preliminary Approval of Class Action
9 Settlement.

10 2. CyEx LLC is an independent operating company and a part of Pango
11 Holdings, which has been involved in the Identity Services industry since 1995 when
12 it was known as Intersections Inc. and was one of the first companies to offer identity
13 protection and remediation to consumers in the United States. Since that time,
14 Intersections Inc., under white label brands and through its own Identity Guard,
15 Identity Defense, Financial Shield, Medical Shield and Privacy Shield brands, have
16 protected more than 47 million citizens in the United States and more than 2.2 million
17 families and have helped resolve more than 150,000 serious identity theft events for
18 their subscribers.

19 3. Many innovations and advancements in technology in the identity
20 protection industry have come from Intersections Inc. Over the past 27 years,
21 Intersections Inc. has distributed its services through a focused distribution network of
22 the largest financial institutions in the United States and large enterprise companies
23 like Comcast, Costco, Yahoo and others, and through servicing both large and small
24 data breach populations over the past 14 years.

25 4. Pango Holdings is a privately held company with several large investors
26 including Warburg Pincus, General Catalyst, WndrCo, Met Life, Madrone Capital
27 Partners (Walton Family Office), and others. Key senior leadership also own a stake in
28 the company. Because the company is private, Pango Holdings revenues and P&L are

1 not published, however the company's revenues in 2024 are more than \$250 million
2 and each of the four operating businesses held by Pango Holdings are profitable on a
3 stand-alone basis.

4 5. Pango Holdings has four operating companies:

5 a. Anchor Free, the 3rd largest provider of VPN services globally under
6 brands that include Hot Spot Shield, Betternet, and multiple other private
7 label brands. Anchor Free on-boards more than 200,000 users globally
8 every day into their services.

9 b. Comparitech, a digital publishing company based in London, writes and
10 publishes reviews of the leading antivirus and VPN providers and
11 generates revenues based on Search Engine Optimization (SEO) and click
12 rates. It is the smallest of Pango Holdings business units with revenues
13 under \$20 million.

14 c. Pango Co., is an operating business that both sells and licenses Identity,
15 VPN and Antivirus software and services to large corporations for resale
16 to their client bases. The business unit uses their own brands as well as
17 private label brands of their clients. This business unit has active monthly
18 subscribers generated through relationships with Costco, Comcast,
19 Yahoo, Bit Defender, Kaspersky, Bank of America, and several other
20 global enterprises.

21 d. CyEx, the 2nd largest revenue generator in the Pango Holdings portfolio.
22 In 2023, the CyEx name and brand were launched. However, the business
23 itself was formed in 1997 as Intersections Inc. and it was the first company
24 to offer Identity Theft services to consumers in the United States and
25 Canada. We have been in this business longer than any of the credit
26 bureaus and virtually every innovation that has launched in the past 20
27 years in this industry came from our shop.

28 6. CyEx focuses only on the Incident Response and Class Action business

1 channels. In the past two years CyEx was awarded the contracts to service the largest
2 data breach class action settlements including Capital One (97 million class members);
3 T-Mobile (77 million class members); Morgan Stanley (more than 15,000,000 class
4 members), Kemper Insurance, Zywave, Insuretech, Banner Health, AJ Gallagher, and
5 multiple others. CyEx was chosen based on the strength of our portfolio of Services
6 and the unmatched quality of our Customer Support team. Since 2008, CyEx has
7 serviced more than 1,900 data breaches for large and small businesses.

8 7. Companies choose CyEx because our experience and innovation around
9 financial monitoring is far more extensive than others in the market and our clients
10 know that CyEx has the requisite experience and knowledge to service any breach
11 population with seamless onboarding, excellent customer service, and attention to
12 detail.

13 8. The service being offered to Settlement Class Members is Financial
14 Shield Pro through CyEx. The plan that will be offered to the Settlement Class
15 Members, if approved by the Court, is two years Financial Shield Pro, which regularly
16 retails for \$12.95 per month. The Financial Shield Pro plan includes the following
17 benefits: Financial Transaction Monitoring; Monthly Credit Score; Score Tracker;
18 Bank & Financial Account Monitoring; High Risk Transaction Monitoring; Real-Time
19 Authentication Alerts; Fictitious Identity Monitoring; Home Title Monitoring; Dark
20 Web Monitoring; Address Change Monitoring; Security Freeze Assist; Lost Wallet
21 Protection; Insight & Tips News Feeds on the Customer Dashboard; Spend Tracking;
22 \$1,000,000 Comprehensive Identity Theft Insurance; Victim Assistance; and Customer
23 Support.

24 9. Identity theft today is primarily focused on stealing a person's money and
25 assets, rather than creating a new "persona" to defraud third parties. Financial Shield
26 Pro offers the most advanced monitoring technology to safeguard a class member's
27 bank accounts and other financial assets, like home and property titles, from being
28 compromised or taken over while still providing safeguards of traditional identity theft

1 services like authentication alerts, high risk transaction monitoring, dark web
2 monitoring, and \$1,000,000 of insurance with -0- (zero) deductible in the event a class
3 member's assets are compromised due to financial fraud. This is a perfect remediation
4 service for this type of data breach.

5 10. To the extent a Participating Settlement Class Member is already enrolled
6 in Financial Shield Pro (or a similar service from CyEx), then that Class Member's
7 current service will be automatically extended by two years for no additional charge.
8 From time to time, and if requested by Class Counsel or the Court, CyEx will provide
9 Class Counsel updates as to the number of Participating Settlement Class Members
10 that have enrolled in Financial Shield Pro.

11 11. At the end of the two-year service period, CyEx will not automatically
12 extend the service to Participating Settlement Class Members. No later than 30 days
13 before the end of the service, CyEx will contact the Participating Settlement Class
14 Members enrolled in Financial Shield Pro to inform them that the Service will
15 terminate.

16 12. Following the end of the service period, CyEx will offer to extend the
17 Financial Shield Pro, or a comparable service, at or below the retail rate of the offered
18 service to the Participating Settlement Class Members in order to allow Participating
19 Settlement Class Members to continue with the benefits of the service if they wish to
20 do so.

21 I declare under penalty of perjury under the laws of the United States of America
22 that the foregoing is true and correct. Executed this 22nd day of November, 2024 in
23 New Jersey.

24 
25 _____
26 Jerry Thompson
27
28